



Div. File

312/345-9780

EPA Region 5 Records Ctr.



354518

December 18, 1984

Mr. Charles E. Licht, P.E.
Charles Licht Engineering Associates, Inc.
P.O. Box 315
Olympia Fields, Illinois 60461

RE: 03104524 - Cook County - Chgo.Hgts./Hall Aluminum
ILD 005246590

Dear Mr. Licht:

We are in receipt of your November 19, 1984 letter and the November 6, 1984 letter from Hall Aluminum concerning operational changes at the subject facility.

We concur with your contention that Hall Aluminum does not need a "certified operator" if neutralizing scrubbant is introduced in-system and no hazardous waste is discharged to your holding pond. However, until your system has been modified to accomplish this, you do need a "certified operator". If your system has not been so modified by February 19, 1985, we will expect you to submit a "Certified Operator Test" application to our Division of Water Pollution Control by that date (February 19, 1985).

The system modifications outlined in your November 19, 1984 letter appear to be adequate to alleviate the hazardous waste problems caused by the use of your holding pond. We see no problems with the proposed system as long as there are no emissions to or from the holding pond and as long as the pH of the liquid in the holding pond remains between 2 and 12.5.

If you decide to implement the proposed modifications, please notify the Agency of the proposed completion date for such modifications by January 5, 1985.

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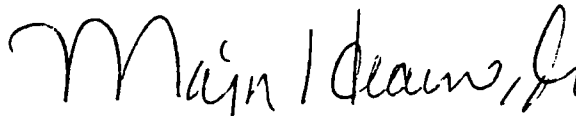
IEPA-DLPC

In response to Donald Retsky's request that we resample the dross piles at his facility using "proper sampling techniques", we suggest that Mr. Retsky hire a private firm to conduct such sampling and the Agency will be willing to split samples with that firm. Our sampling techniques were "proper" and our results were accurate. However, if Mr. Retsky feels that additional sampling will produce different results, we are perfectly willing to cooperate with any firm that he contracts. Mr. Retsky may contact Bonnie Eleder of our Division of Land Pollution Control (345-9780) to set up a date for resampling if he so desires.

Until/unless additional sample results indicate that the subject dross piles do not contain levels of lead in excess of Resource Conservation and Recovery Act (RCRA) standards, the older stockpile will continue to be considered a "waste pile" as defined in Section 720.110 of the Ill. Administrative Code, Title 35, Subtitle G and we will continue to expect your facility to adhere to the requirements of Section 725 of 35 Ill. Adm. Code as a "storage facility". If Hall Aluminum has not contacted the Agency by January 15, 1985 to schedule a resampling date or to provide mitigating evidence on the levels of lead in the dross stockpile, we will expect that company to comply with the requirements of Section 725 of 35 Ill. Admin. Code by February 19, 1985 or we will refer this case to our Enforcement Services Section for handling.

Please reply within ten (10) days.

Sincerely yours,



Major Hearn, Jr.
Regional Coordinator

MHJ:gec/Doc.#0104A

cc: DWPC-FOS
DLPC Regional File
DLPC Division File
DLPC, D. Gimbel
Hall Aluminum, Donald Retsky
Multi-Media File